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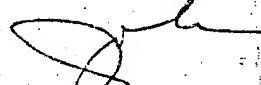
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Executive Secretary
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SEP 8 1981

Honorable William J. Casey
Director
Central Intelligence Agency
Washington, DC 20505

Dear Mr. Casey:

Every year our National Archives and Records Service sponsors a
Records and Information Management Conference for Federal managers
and records and information management specialists to broaden their
knowledge and to share their experiences. This year the conference
provided an opportunity to bring together 168 people to develop
recommendations for the implementation of the Paperwork Reduction
Act of 1980.

Attendees spent half of the three-day conference in working groups
discussing and compiling recommendations on specific aspects of the
Act as it affects their agencies. Their recommendations were presented
to the entire conference on the final day and have been compiled in the
attached report for your information.

I hope you will find the conference recommendations useful to you and
your staff in implementing the Paperwork Reduction Act of 1980 in
your agency.

Sincerely,

Ray Kline
Deputy Administrator

Enclosure

The 20th Annual
RECORDS and
INFORMATION
MANAGEMENT
CONFERENCE

Sponsored by

NATIONAL ARCHIVES AND RECORDS SERVICE
GENERAL SERVICES ADMINISTRATION

MAY 20—22, 1981
GETTYSBURG, PENNSYLVANIA

Keynote Address Presented
by Ray Kline
on May 20, 1981

I would imagine that everyone here would agree that we are truly at a
watershed in American government. Looked at in the context of history,
this is not simply a political statement. There is a lot of reaction
taking place in the general population, much of it positive. I think
that there is some bewilderment among Federal Government employees as to
our new direction. However, a certain curiosity as to exactly what the
watershed is going to amount to, and as to the impact on our personal
lives and futures, really can't be satisfied until we move further
through the political process in terms of budgetary and program decisions.
It can be said right now that we are undertaking a substantial change in
the role of the Federal Government. This change is probably more compre-
hensive than any since the initial days of the New Deal. We see a cutback
in what the government does and a reassessment of what it should do, par-
ticularly in the regulatory sector.

I think we are finding that we are going to be asked to do more with
less. Again this sounds like a political statement. I don't know how it
is in your outfit, but at GSA we've been asked to do a little more, at
the same time that we received our budget letter cutting us across the
board by 8%, in numbers of people. (I don't need to cite the percentages
for the out years.) The point is that those percentages are not accompanied
by a comparable diminution of function. If we are to do more with less,
there has to be a change in process, in the way things are done. I believe
that in this administration we're going to see business acumen entering into
these changes. I think that some new practices in government may be in
the offing. We should bear in mind that one of the things that the new
members of the administration have in common is a business management
background. In the context of the things you and I are asked to do in
the government, this aspect is critical.

The main theme in this conference is the Paperwork Reduction Act. Even
though the thinking that gave rise to this act antedates this administration,
I think it is remarkably coincidental that it arrives on scene at the
same time as the new administration. This new act, if properly implemented,
presages fundamental changes in the way information resources are going
to be managed in the Federal Government. If you want my personal assessment
of the bottom line, that change is greater management control, starting
at the top of the Executive Branch, and running right down through all
the departments.

Because we are in the early days of implementation, we are just beginning
to think about how implementation is going to work. Therefore I'd like
to talk a little bit about some of the key features of the Act, and
about how I see this working out. In doing this I would like to address
it from two aspects: first of all, from the top Executive Branch level,
let's call it the OMB level, and secondly at the GSA level, where I will
discuss some of the concepts that we have in mind. From the Executive
Branch level, OMB is the lightning rod for implementation, the outfit

that was assigned most of the responsibility under this act. GSA, which had and still has an important responsibility in this area, is being looked to in a subordinate capacity to OMB to carry it out. In this context, I would like to talk about three particular OMB initiatives:

first, the five year planning called for by law, the planning system for automated data processing equipment and telecommunications;

second, the triennial reviews of agency information management programs; and

third, how departments should move in setting up information management organizations.

On this third point, if you are having the same head scratching going on in your place that we have in ours, I would imagine you may be curious as to whether one year from today you will be sitting in the same office reporting to the same people. This organizational provision is something we are obliged by law to have in place by July 1. And this is going to mean some changes in the area of information resources management, in where people work, and in what their responsibilities are going to be across the government.

My theme is based on some of the people I've gotten to know in the new administration, and on their own strong preferences as to how very large businesses should operate. Weighing these observations against the requirements of the Act, we can see what is doable. I think there is going to be an enormous impact at the top of the government, directed from the OMB level, on the development of standards and review mechanisms, including some reporting. On the other hand, I think there has got to be a diminution of transaction level control by the top level of the Executive Branch. In other words, in a hopefully more programatic manner, we have a greater line management accountability in the departments and agencies. Treat the heads of these departments and agencies like big boys and girls. If they hack it, you reward them, and if they don't, you make the appropriate management changes. That sounds like business administration in the private sector. I think that we have to do away with the mechanism that has been used in the past to control people by transactions because you don't trust them, or I don't see the requirements of this act being met. There's going to have to be an accountability at each level of the system, including the very job that you're holding, and the things that you've been asked to do.

Now let me talk about each of the three initiatives, starting with the planning process for ADP and telecommunications. I arrived at GSA from NASA very unhappy about the GSA process for reviewing ADP acquisition requests. We at NASA thought it was appalling--the time delays, the paperwork, and the problems of that nature. My boss, an admiral from the Navy, arrived with a similar frame of mind. We went to work with Frank Carr to try to streamline the ADP acquisition process. You will have to tell me how it has all worked out. We now have a tentative FPMR under which people are working and we're hoping to hear back at the end of the year on whether the process has improved. One of the features of

the new approach is to take a lot of the paper, the documentation, out
of the process and to cut it to a more executive level. There is greater
delegation to the agencies, in terms of more kinds of action they can
take without coming to GSA, and fewer kinds of actions that should come
to GSA for review. We feature an approach where we do not second-guess
procurement decisions coming from the agencies. Your procurement officer
is as good as ours. If he or she says sole source is OK, document that
and keep it in your files. You live with the auditors and the functional
reviews coming thereafter. That's called management accountability. We
have tried to include that feature in the review process.

In addition, we are trying to strengthen our capabilities by bringing
onboard people who have a lot of savvy in advising agency personnel on
how to undertake new ADP applications. This is what we are calling our
agency liaison office concept. We are not there yet. With the kind of
wage structure we have it's hard to find people with this expertise,
because they can command very attractive wages in the private sector.
Nevertheless, we are moving in that direction as well.

As we're trying this program out, and we are working with the agencies
on the FPMR, we're taking a look at the paperwork. We're finding that a
lot of agencies know that they have an opportunity to try a new mode,
but don't want to change from the old. People are now experienced in
the old practices and, thank you, they don't want to change their stripes.
They continue to live with the old mode because although there may be a
mountain ahead of them in the way of getting something done, at least
they know there's a mountain there. With the new approach God knows
whether there will be two mountains or a nice flat level surface. They
don't want to take that kind of risk. However, these are things that we
did undertake last year and I wanted to mention today, because behind
the ADP planning that will be going on is a process that the agencies
and departments should find a lot more liveable.

Now call to mind the terms of the law on the ADP and telecommunication
five year plan. This is what the law says: "OMB, in consultation with
GSA, must develop a five year plan for meeting the automated data processing
and telecommunication needs of the Federal government". Those of you
who have been around a while, and have worked on ADP plans in the past,
know what happened in the OMB sector. The plan turned out to be a
numbers game, where targets were set as to the amount of funding that
could go into ADP. It truly was a budgetary device more than anything
else. If that concept continues under the new plan, the objectives of
the act, in my mind, are not going to be met.

I think we are going to have to start with a definition of terms. What
do we mean when we say ADPE and telecommunications in this world of new
technology? Does that include your word processor? Does that include
the new techniques you are using in the library organization? The
computer network capabilities you are using to do the kind of things
that you do? What are the parameters and where are the lines? To me
these are the first things that have to be known. Then we need some

definition of the fields of information to be captured. The requirements, sources of the data to be obtained, how's it to be addressed in a systems context, things of that nature. What is it that is critical to the plan? What do you need to know when you are putting the plan together? Above all, the plan must be based on need. Those of you who work with this kind of problem know that to envision for your department the kind of ADP capability you're going to need five years from now is no small task. This is a task that has not been done efficiently for a couple of reasons. It is not that we're a bunch of lousy managers. It's because of the great horse race in technology, on the one hand. On the other, it is because organizations and programs don't seem to settle down, so that you can say with assurance that five years from today we're going to have a steady state universe, and that's the way we ought to go. It is hard to anticipate five years in advance the capability of the Jet Propulsion Lab to have something circling Saturn, when only God knows the fate of the Saturn Program before the Houses of Congress. And it is so, I would imagine, across all departments and agencies, in assessing these capabilities, and planning to build them in place. These are some of the questions regarding the five year planning system that are going to have to be tackled. They have been addressed by OMB, but we expect to participate with them in putting that kind of structure together.

A second area is the Information Resources Management Reviews. What does the law say about this area? The law says the following: OMB, with the help of GSA, will review at least every three years, by means of selective inspections, the information management activities of each agency to ascertain their accuracy and efficiency. The nature of the reviews is not specified in the act. But from your backgrounds you can imagine the panorama of alternatives as to what a review might entail and how comprehensive it ought to be. Once again, we get back to a definition of information management activities. We tried to do a preliminary study on this in GSA. We found that the number of people who could reasonably be identified with information management, and people who work solely with information will total around 1600 in the universe of 35,000. I don't know what the ratio is in your agency, or what that universe will entail. But try to imagine a review system that steps into that universe once every three years and try to determine how that review is to be conducted. No small task, but it is a task and it is required by law. Here are some of the things that we are going to be suggesting to OMB when they structure this review process. First, we are going to recommend strongly that the departments and agencies be asked to embark upon a program of self appraisal; to assume the accountability for what they have; to take a look at how they are coming along in the management of information resources, and to develop reports to the satisfaction of their own management. Again, this would make agency managers responsible for their own operations. Second, we will suggest that when a review team comes to your department, the team membership should include people from other departments. Maybe there is something to be gained by cross-feed. Perhaps we should get away from the inbreeding that has come about in the thinking of OMB and GSA, by including some of the people involved in information management activities in other departments and agencies. There may be a lot to be gained from these ideas, and they ought to be tried out. Finally we should address the point I

mentioned first, - the scope of these reviews, what they should entail. How much do they reach into ADP? How much do they reach into telecommunications? Does it occur to you that perhaps a triennial review is going to get into the question of how many telephones you have, and what your transcontinental hookup is? And what about telecommunications systems that reach the remote posts of your organizations? Should reviews embrace those highly technical kinds of things or should they be more constrained to records management? The scope is a very important question, as is how the triennial review ought to be approached. What may happen is that we may find that the triennial system of review is going to target other more extensive reviews into more specialized areas, such as ADTS procurement audits and the records management inspections which are also provided for by law.

And that's the final area that I want to mention - the records management inspections. The objective of these inspections is to assess cost and benefits associated with agency use of records management systems. The law said that GSA will conduct these inspections, and send the results to OMB and the Congress. When we submit these reviews, we'll want to have your comments on the reviews attached. Then we are also to include, from GSA, our estimates of the cost savings if our recommendations are adopted. If these things are going to make sense at all, you must be operating against guidelines and standards that have been established Government-wide. We're going to put a major emphasis on this in GSA - to get these guidelines out. Again, we are setting the guidelines, we are setting the standards, you are helping to develop them, you manage against them, you help to evaluate your progress, you help to resolve the inspection reports, so that we're in sync with one another and come out with a net product of general benefit to the Government.

I will turn briefly to the organizational questions, and some of the things we are looking at in GSA. The act itself has this organizational point to make: OMB is charged with the job of integrating information handling disciplines (whatever that means). We keep coming back to definitions. Behind the law is a House Committee report that said that GSA should consider the need for a consolidation of GSA activities pertaining to ADP, telecommunications and records management. We have two services directly involved: one is the National Archives and Records Service, where we have records and information management, and the other is the Automated Data and Telecommunication Service, where we have our ADP and telecommunications planning. We have very little formal connection there today. For the last several months, we have been studying how these might be integrated. We have not yet made any decisions; but don't be surprised if somewhere in your future you see a consolidation of these activities in GSA, in some manner, to give them a common focus. Our objectives here are apparent. We want to have a minimum of overlap in the services as to who is responsible for this business in GSA and what the authorities are. I'm hearing from some of the departments that they are seeing some overlap and redundancy in some of the activities performed. Finally, we want to have an efficient common approach, with the best use of the resources at our disposal.

But there's a lot to do. You will notice that if I were to sum up my remarks, there would be more questions than there are answers; more concepts that need definition, more problems that need solving. This is a tricky law to implement, and I think that it will be a challenge to all of us. But it is the law. And by working together, I'm sure we will get it done. You've been urged already to apply your creative talent during the conference to see what recommendations you can come up with. And I'm really looking forward to a feedback from the conference that we can use in our own planning to help make this law work.

ADDRESS BY WILLIAM J. ANDERSON
DIRECTOR, GENERAL GOVERNMENT DIVISION
UNITED STATES GENERAL ACCOUNTING OFFICE

ON

GAO'S VIEWS OF

INFORMATION RESOURCES MANAGEMENT

I am pleased to discuss GAO's views on the information resources management principles established by the Paperwork Reduction Act of 1980 with you people who will play a key role in implementing the act. Therefore, I hope my remarks will help set the tone for discussions throughout this conference about what implementing the act will mean and what support you need from OMB, GSA, or your own agency to accomplish this goal. Before I get into my discussion, I believe I should provide a brief orientation on where GAO stands on the act and on my Division's role within GAO as it relates to the act.

GAO was an early supporter of Public Law 96-511, the Paperwork Reduction Act of 1980. GAO in general, and my Division in particular, participated extensively in efforts leading to its passage. On February 7, 1980, then Comptroller General Staats testified in favor of the House bill, concluding that

> "* * * we see enactment of H.R. 6410 as an important landmark in a concerted effort to establish consistent Federal information policies. The management structure and tools put into place by this legislation will assist us in working toward solutions for the many information management problems now existing."

The Comptroller General cautioned the Committee members that,

> "We should not, however, deceive ourselves or others that this legislation represents more than the beginning of a long and difficult task."

We at GAO plan to continue our efforts to aid in implementing the legislation consistent with the wishes of the Congress. My Division--the General Government Division--has been given the task of serving as the focal point for GAO's audit and evaluation efforts which related to P.L. 96-511. That does not mean that my staff will either perform or supervise all of GAO's work related to the act. It does mean that we will focus our own work on, and coordinate that of other GAO divisions directed toward, implementation of the various information elements of the legislation.

Now, I'd like to discuss with you how we view the Paperwork Reduction Act and information resources management, highlight key elements of the act, and describe GAO's role and some of the areas we will give particular attention in the near future.

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The Paperwork Reduction Act is, of course, much more than the title implies. Those of you who have been in the information management area or who followed the legislation as it moved through Congress, are well aware of the broad-based information management policy document which emerged.

While the legislation initially stemmed from a growing concern about paperwork burdens imposed on the public, during the legislative process Congress recognized the broader issues associated with the collection, use, dissemination, and disposal of information and the new technology available to do those things faster, better, and cheaper.

These issues and concerns were supported by numerous studies and reports from a wide variety of sources, all of which had recommended improvements in Federal information management. Taken together, these studies painted a picture of ineffective information management practices ranging from lack of control over paperwork burdens to wasteful ADP procurements.

Although other studies played an important role, the Commission on Federal Paperwork probably should be credited with surfacing many of the needed reforms addressed in the Paperwork Act. The Commission's wide range of studies justifiably captured a great deal of attention in the Congress, and provided a catalyst for legislative action which had previously been lacking.

WHAT IS IRM?

The key question is "What is information resources management?" Right now it means different things to different people. The Paperwork Commission's report entitled Information Resources Management appears to have laid the conceptual framework for much of what we see in P.L. 96-511. This report set forth the idea that information is a resource which should be managed. It also pointed out the relationships between the different elements of information management--paperwork burden control, statistics, information technology (ADP, communications, etc.), records management, and so forth-- and recommended consolidating these separate functions into a coherent information resources management system.

I would like to give you a description of information resources management as we at GAO are beginning to define it. The definition undoubtedly will be refined in the future as we proceed with our work.

Information resources management in its purest sense is the management of data and information in such a way that it facilitates and promotes the accomplishment of agency and program goals and objectives. It pervades each and every Government activity and program because decisionmaking, whether it is for determination of benefit eligibility, for regulatory, or for other management purposes, rests on the data and information collected and used by the agency manager. Information resources management is doing those things necessary to get the right information to the right people at the right time to permit effective and efficient decisions to be made.

The managing of information resources is no different than the management of other traditional resources such as money, people, supplies, and materials. Information resources management includes the planning, budgeting, organizing, directing, training, promoting, controlling, and other managerial activities involving the collection, use, and disposition of information. Collection, use, and disposition form the information life cycle. The life cycle can be broken up in more detail to also include such functions as requirements definition, transmission, processing, dissemination or distribution, storage, and retrieval.

The management of data and information requires that appropriate policies are established and implemented and structures are in place to permit data and information to be used as are other program and agency resources. In addition, such management involves the application of paperwork, statistics, records management, and information technology techniques and tools in the collection, use, and disposition of data and information. Other factors which are to be considered when managing data and information include privacy, confidentiality, and freedom of information issues.

Some people have questioned the benefits to be derived from the Paperwork Act. In GAO testimony, Comptroller General Staats said the Paperwork Act would greatly strengthen the hand of OMB in exercising its broad responsibilities for improving the management of the Executive Branch of Government. Without the legislation, the fragmented policysetting and oversight would continue and badly needed changes in Federal information management would not be made.

In a letter to the House Government Operations Committee after our testimony, we cited several managerial changes which we considered improvements. These included establishing visible and accountable officials in OMB and the agencies, establishing a single control point for information management policy and oversight, and providing much-needed visibility for records management. In that letter, we provided the Committee with several examples taken from the numerous GAO reports illustrating problems in information management and demonstrating opportunities for substantial cost savings both within the Federal Government and in the private sector.

We recognize that it is difficult, in many areas, to quantify the benefits from management improvements. How do you put a value on better decisionmaking? Yet the application of good information management techniques and processes will provide greater assurance that the right information gets to the right people at the right time and that Government costs are minimized. Some of the applications will initially cost money, such as acquiring new information technology. However, the potential for savings due to increased efficiencies in Government operations should outweigh these costs by a considerable margin.

Information resources management ideas and concepts are now beginning to be implemented. But, I think everyone would agree that we are just beginning a long and challenging task. With that in mind, I'd like to highlight for you what we see as three key elements of P.L. 96-511. We will be giving a great deal of attention to these areas in the months to come.

KEY ELEMENTS OF THE PAPERWORK ACT

The first item--and, in our view--the one upon which everything else depends, is the establishment of a strong central management structure in OMB. This structure includes the authority, responsibility, and accountability for promulgating sound, consistent information management policies and for over-seeing the departments' and agencies' implementation of those policies.

The legislation provides for this kind of structure--centered around the concepts of information resources management I discussed earlier. Within OMB, policy and oversight responsibility for the various information manage-ment activities is consolidated in the Office of Information and Regulatory Affairs. The Office is headed by an appointee of the OMB Director; however, the Director is accountable for exercising the Office's functions.

GAO strongly supported the creation of this central management structure. We believe it is essential if the objectives of economy and efficiency in managing Federal information activities are to be achieved. The words in the legislation are all there. But they won't make it happen. Only the people in OMB and the agencies can do that.

The second essential element of P.L. 96-511 is for the Departments and agencies to implement their charter of responsibilities. The act calls for the designation of a senior official in each agency. This official will report directly to the agency head and be responsible and held accountable for managing all information activities. Although the law does not specific-ally mandate that the agency offices be identical to the OMB office, it is clear that there was the intent for a high degree of compatibility.

The act requires that agency senior officials be designated by July 1. We understand that OMB expects to issue guidance to assist the agencies in this effort in the near future. We will be observing these efforts with great interest, and hope that there is clear understanding that a perfunctory designation, followed by business as usual, is not what the Congress intends.

A third item we intend to emphasize during the next several months is an assessment of opportunities for applying information technology to reduce costs and improve program operations and delivery of services to the public. Many Federal agencies have successfully applied modern information tech-nology to enhance their ability to carry out their missions.

In times of scarce resources and fiscal control, we must provide vital Government services more economically and efficiently. By using proper information resources management concepts when looking for potential appli-cations of modern technology, the Government can maintain and improve services while meeting the public's mandate to reduce costs.

We believe that additional opportunities to apply technology exist and will devote a substantial amount of resources to identifying them as the imple-mentation of P.L. 96-511 proceeds. We hope that our work will stimulate sustained efforts of this type by OMB, the departments and agencies.

GAO's ROLE

Now, I'd like to elaborate a little on what I see as GAO's role in helping make information management work in the Federal Government. Essentially, we see our role as synonymous with making P.L. 96-511 work. Perhaps it would be useful to outline GAO's involvement in the efforts leading to passage of P.L. 96-511, as I believe that background is essential to understanding GAO's strong commitment to the principles embodied in the legislation.

The roots of GAO's involvement in the Paperwork Reduction Act of 1980 can be traced back as far as 1973. The Trans-Alaska Pipeline Authorization Act-- enacted in November 1973--included a non-germane rider which amended the old Federal Reports Act by shifting responsibility for forms clearance for independent regulatory agencies from OMB to GAO. We believed at the time that the shift was a mistake, because we felt that it put GAO into a role which was inconsistent with our basic mission of performing audits and evaluations for the Congress. We said so, but the climate of the times was such that nobody listened.

As time passed, several members of Congress became increasingly concerned with the issue of the growing paperwork burdens on the public. In October 1975, under the leadership of Congressman Frank Horton, the bipartisan Commission on Federal Paperwork began a 2-year study with--as Congressman Horton put it--the objective of "identifying the root causes of paperwork burdens."

GAO was heavily involved in the Paperwork Commission's efforts by virtue of former Comptroller General Staats' membership on the Commission. Consequently, after the Commission's work was completed it seemed perfectly natural that Comptroller General Staats and Congressman Horton would agree that GAO staff should begin to draft legislation aimed at implementing the Commission's recommendations for centralizing and strengthening the paperwork control process and the statistical policy function. The latter activity had been shifted from OMB to the Department of Commerce.

To summarize a lot of effort, I'll just say that GAO staff began our initial legislative drafting efforts in February 1978. We worked with Congressional staff in developing and revising numerous versions. We also detailed staff to work directly with the House and Senate committees right on through the day P.L. 96-511 was signed.

I don't mean to suggest that GAO is the only one responsible for the development and passage of P.L. 96-511. Other people and organizations played key roles in the legislative process, as they properly should. I do mean to emphasize, however, that GAO believes in the principles of P.L. 96-511, willingly invested its resources to support the Congress in passing the law, and will continue to invest resources to bring about effective implementation.

We recently issued the first in what will be a series of reports on the Paperwork Act. This report documents the history of neglect in Federal records management (PLRD-81-2, February 24, 1981) and advises Congress on how it can use the act to bring about Federal records management improvements.

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GAO will continue to be heavily involved in assessing for the Congress the progress toward implementing the Paperwork Reduction Act. Our reviews will focus on OMB and agency efforts to develop policies, establish organizational structures, and take advantage of opportunities to apply information technology for improved service delivery and reduced costs. Future reviews will also focus on the various tasks and deadlines mandated by the legislation. We will focus a number of our jobs on integrating the information management elements as well as continuing to perform reviews directed toward evaluating individual information management elements. We will also use our evaluation of records management programs as a benchmark for measuring records management improvements expected by implementing the act.

We consider the Paperwork Reduction Act as landmark legislation with tremendous potential for improving the Federal Government's information management activities. As I mentioned earlier, GAO has issued numerous reports demonstrating the opportunities for cost savings through improved information management. Our records management report is merely one such example identifying savings achieved by agencies with good records programs. Untapped savings abound in the areas covered by the act. Achieving that potential will, however, be very difficult. If those of us who supported the legislation behave as if the task is over, it will, in fact, be over--without any results.

I am reminded of a recent response by Mr. Staats when asked by a Senate committee how best to try and identify management improvement needs in Government. He said, "It isn't something you can think about once a year and expect it to work. Good management is something that has to happen every day."

The Paperwork Reduction Act establishes a comprehensive structure for Federal information resources management. We at GAO intend to do our part every day to make it work.

WHAT CAN YOU DO?

Our final question--What can you as conference attendees do? By attending this conference you have taken a step toward assuring the success of the Paperwork Reduction Act and, more importantly, your success in improving your respective agencies' information management practices. Through candid discussions of the act, and identification of issues which need to be resolved, you can lead the way in implementing the information resources management concept. What you learn here of common problems and the ways other agencies have solved them can help you in your day-to-day activities. More importantly, your efforts here should result in a roadmap which can be followed by OMB, GSA and other agencies as well as by your own respective agencies. We at GAO will look with interest at your recommendations and views to help us fulfill our responsibility to advise the Congress on how the Paperwork Act is being implemented, what its benefits and limitations are, and what else can and needs to be done.

Thank you very much and good luck in your work here the next three days.

SUMMARY

This report on the proceedings of RIMCO '81 contains the conclusions and recommendations of the seven working groups. Each group concentrated on a particular provision of PL 96-511, the Paperwork Reduction Act, or on a program or issue affected by the legislation. This record represents the results of the working group deliberations as they were presented at the final General Session at the conference.

Recordings of the presentations and notes provided by the working group recorders were used to prepare the reports. Reports were then reviewed by a group representative (usually the Chairperson). The material presented here reflects the opinions of the conference participants. No attempt was made to modify the substance of the comments and recommendations to achieve consistency among groups. Nevertheless, several common themes may be noted throughout the working group reports.

The consensus of the conference is that for an effective and orderly implementation of PL 96-511 basic guidance must be provided by OMB. Though recommendations vary on the extent of guidance needed, all the groups made some reference to the need for more than is currently available. Many participants felt that agencies should provide some input to whatever guidance is issued. The recommendations were not specific as to proposed content of the guidance, but there seemed to be general agreement that basic guidance would contain definitions of key terms, procedural instructions to agencies on implementation, a timetable or schedule for implementation, and criteria for measuring the effectiveness of implementing activities.

A second area of general agreement was on the pivotal role of the Senior Official in each agency. The groups identified this official as being involved in implementing FILS, coordinating reviews in the agency and providing guidance to the program managers in information resource management activities. A view emerged of the Senior Official as having major responsibilities for coordinating all information management activities within the agency and as the primary channel for IRM-related communication between the agency and OMB, GSA and other organizations.

Finally, several groups agreed that a substantial body of knowledge about information resource management already exists. They stressed the advantages of building on structures currently in place, and using materials already developed in carrying out the provisions of the Act. The availability of information locator systems in a variety of agencies was but one of several examples.

The reports that follow contain the complete record of the comments and recommendations, both general and specific, of the RIMCO working groups. Many of the recommendations are addressed to OMB, some to GSA and to agency managers responsible for implementation.

ORGANIZATION AND STAFFING
Group A-1

Topic: The group discussion focused on implementation of the single manager concept of §3506(b) of the Paperwork Reduction Act, that is, designation of a Senior Official responsible for information management programs in the agencies. The impact on the organizational structure, staffing patterns and lines of communication, and the effects of the required changes on the level and quality of current services and on professionalism in the information management disciplines were discussed.

General Comments: The group established the following objective: "To encourage OMB to provide guidance which ensures flexibility to all agencies to organize in a manner that allows implementation of PL 96-511 in accordance with the spirit and intent of the Act."

The fundamental concern of the group was the degree to which OMB might specify agencies' internal organizational structure. The group agreed that they would not attempt to suggest the proposed content of the OMB guidance, but would address ways that OMB can ensure that the guidance will be reasonable, meet agency needs, and be promulgated efficiently and be understood. Five areas of concern were identified:

  1. Agency managers are now unsure of the extent of the guidance that they can expect; they are therefore reluctant to invest resources in a compliance effort that may prove to be founded on misunderstandings. A statement of OMB's definition of the Senior Official's role and functions is critical. Definitions of other related terms such as information, in the context of the managerial role, are also needed.

  2. In developing guidance, OMB must recognize agency resource limitations. This recognition of resource limits, related to organization and staffing, should also be reflected in subsequent years in the budget process.

  3. Agency managers need a master plan or time schedule beyond the few deadlines specified in the Act. OMB's expectations should be made known in sufficient time for agencies to plan and take necessary action.

  4. There is a significant requirement for training of agency personnel at several levels. Senior Officials and program managers would benefit from seminars which would form the basis for a common understanding and provide a forum for interaction.

  5. Finally, agency representatives need to be involved in the formulation of OMB policy and guidance. Unilateral action on OMB's part would be detrimental to effective implementation. Agencies have contributions to make in the development process.

Related concerns were identified as issues to be resolved internally in each agency:

Need for top management support and recognition for the single agency officials and the information management organization,

Need for internal accountability for implementation actions, and

Delegation of authority commensurate with the responsibility throughout the information management structure.

Recommendations: The recommendations were developed to deal with each of the areas of concern. They are addressed primarily to OMB, and describe the actions that the group suggests would enhance the effectiveness of OMB guidance on organization under the single manager concept.

1. OMB guidance should contain a clear statement of the Senior Official's responsibilities and functions, and should define key terms related to information resources management. Such definitions would promote common understanding and, therefore, consistency among agency programs.

2. OMB should recognize agency resource requirements in the budget process.

3. OMB should publish a time schedule and master plan for implementation activities in OMB and the agencies.

4. OMB should sponsor government-wide training seminars for senior managers and program personnel. Government-wide training will ensure a common understanding among agency personnel who will be responsible for implementing the OMB guidance.

5. OMB should continue the participative involvement of other agencies in policy/guidance development.

FEDERAL INFORMATION LOCATOR SYSTEM
Group A-2

Topic: The group discussed the requirement of §3511 of the Paperwork
Reduction Act to establish and operate a Federal Information Locator
System, (FILS). The group concentrated on cost-effective methods for
implementing the system and for ensuring that the established system
meets agency needs.

General Comments: The group discussions covered four areas of interest:

  1. Communications and coordination required to ensure continuous
      input of agency requirements and suggestions to OMB;

  2. Definition of the boundaries of the FILS, and the need for cost-
      benefit analysis in establishing the scope;

  3. Operational considerations, including suggestions for minimizing
      the cost and methods for enhancing the usefulness of the system; and

  4. Interim measures for achieving the intent of the legislation.

A recurring theme in the discussions of each of these areas was the poten-
tial benefits to be derived from use of materials already developed, and
mechanisms already in place, to complete the implementation of FILS.
These comments referred not only to specific tasks already accomplished
toward establishing the FILS system, such as the work done by previous
task groups and contractor organizations, but to other materials avail-
able in the agencies that could be adopted to further progress on the
FILS.

The emphasis of the group was on applying basic principles of good manage-
ment to this effort, from the development of a master plan through
monitoring progress, application of cost/benefit analysis techniques, and
thorough testing and evaluation of the system.

Recommendations: Most of the recommendations were directed to OMB. Many
were quite specific. They are grouped according to the area of interest
to which they relate:

1. Communication - Coordination.

     a. Reinstitute the Interagency Task Force on FILS by July 1, 1981.
The task force membership should be appointed by the Senior Agency Officials,
and should be drawn from the information management community. The re-estab-
lishment of the Task Force should be widely publicized throughout this
community by letters to information management personnel at all levels, as
identified on mailing lists maintained by OMB, NARS and ADTS. This would
allow individuals to make their interest known to the Senior Official.

     b. The Task Force should meet regularly, and provide quarterly
written status reports.

c. Task Force participants should project their user or agency's requirements. Agencies may wish to establish internal coordinating groups to define their requirements.

d. The FILS Project Manager should be the Chairman of the Task Force; this would ensure coordination between OMB and the Task Force.

2. Definition of Boundaries - Cost vs. Benefits.

a. The FILS Task Force and FILS Project Manager should define the boundaries of FILS information. The group recommended that only the major classes of data should be entered and not all of the detailed data. The group also would recommend that the first product of the FILS be devoted only to public use data.

b. The FILS Task Force and Project Manager should first review, compare, and combine the reports prepared by the previous Task Force and the Planning Research Corporation study reports. Further development should be based on these materials.

c. The FILS development effort should be conducted subject to the provisions of OMB Circular A-109.

d. The Task Force should perform a cost-benefit analysis of the FILS, considering both agency operational costs and benefits and the costs and benefits to the public. Alternatives meeting agency user requirements in addition to public use needs should be studied.

e. To ensure continued OMB funding of the operation of FILS in subsequent years, the group recommends that the total FILS cost, excluding user costs, should be represented by a line item in OMB's budget.

3. Operational Considerations.

a. OMB should establish a master plan for FILS which spells out goals and objectives, and a schedule for development, test, evaluation, installation and operation of the system. Quarterly status reports on major milestones should be published in the Federal Register. The Federal Register should be used to obtain public comments on FILS.

b. The development effort should build on the collective experience of OMB and the agencies. Consideration should be given to using available resources; for example, the Federal Register Thesaurus which is used by all agencies for directives systems may be applicable.

c. FILS should remain separate from the RMS. The group placed great emphasis on this point.

d. Compliance with applicable FIPS standards is critical.

e. The FILS should contain information on retention periods for records. This would provide substantial benefits to a user agency needing information collected by another agency.

4. Finally, the group recommended that as an interim measure, OMB should develop and distribute a listing of current information locator systems, including agency contacts, by October 1, 1981. There are many such locators available in the Federal agencies, and a listing would provide interim benefits to users in agencies and the public.

TRIENNIAL REVIEWS/INSPECTIONS
Group A-3

Topic: The group addressed the topic of the triennial reviews required by §3513 of the Act. The group's objective was to develop recommendations on the content and scope of these reviews and to suggest methods that could be used to conduct such reviews. The group assumed that the reviews would be made within existing agency, GSA, and OMB resources.

General Comments: The group agreed that the purpose of the triennial reviews was to ascertain compliance with the requirements of the Act as spelled out in §3506, Federal agency responsibility, that is: Efficient, economical and effective management of information including:

    a. compliance with information management standards and policies as prescribed by OMB;

    b. designation of a single Senior Official to be responsible for agency implementation of the Act;

    c. agency program responsibilities, including:

        1. inventory of management information systems,

        2. elimination of system duplication or overlap,

        3. assessment of paperwork burden imposed by agency proposed legislation, and

        4. systems acquisition responsibilities assigned to the same Senior Official.

    d. establishment of the Federal Information Locator System, and agency compliance with all FILS requirements.

The group concluded that audit criteria already exist in documents such as Federal Property Management Regulations, OMB Circulars, FIPS Publications and the like for many of the functions covered by the Act.

In the opinion of the group, these requirements adequately spelled out what would be covered in the triennial review.

Agency concerns identified by the group centered on the need for OMB guidance and ground rules related to implementing the requirements of the Act. The guidance should be broad enough to recognize the unique nature of each agency's responsibilities. Examples of such guidance which the group pointed to include OMB's guidance on the Privacy Act and the Attorney General's Freedom of Information Act guidance.

A secondary concern was the reviews should not duplicate other types of reviews or inspections conducted by various Federal agencies under other legislative mandates. These include records management reviews by NARS as well as IG and GAO audits and inspections and agency self-inspections. External reviews by private groups could also be included.

Although the group did not recommend any changes in assignment of responsibility for the various types of audits, they agreed that coordination was necessary to prevent duplication of efforts.

Such coordination would be possible if a single official, such as the designated Senior Official, served as point of contact for all information related inspection efforts and maintained copies of reports of all such inspection and audits. This data base, or "Triennial Review File" could be a valuable resource to OMB in targeting selected areas for review. One alternative the group considered was requiring that agencies provide copies of such reports to GSA and OMB.

The question of whether the reviews should be performed by OMB or by GSA or another agency was discussed, but no recommendation was made. It was assumed that GSA would continue its existing reviews and that OMB could build upon the reviews discussed above.

Recommendations:

The recommendations address the major agency concerns:

    1. OMB guidance should establish broad guidelines for implementing the Act. The triennial reviews could be based on this guidance as well as the requirements of Section 3506.

    2. Agency self evaluation is the first level of the review process.

    3. The designated Senior Official in each agency should be the principal point of contact for the triennial reviews, as well as other types of reviews or inspections of the information related activities of the agency, and for follow-up activity. This will serve as a control mechanism to minimize duplication of effort in the review activity.

    4. A good follow-up system is needed to ensure that recommended improvements are properly implemented.

    5. The FILS could also be established in such a manner as to serve as a resource for OMB in the review process. This recommendation is predicated on the possibility of expanding the FILS to cover areas other than public use reporting. Viewed in this context, however, the April 1982 deadline becomes critical.

PROGRAM MANAGER'S RESPONSIBILITIES
Group A-4

Topic: The group attempted to identify the impact of the Act on program
managers within the Federal agencies and to devise some methods for
ensuring that the attention of these officials is directed to the intent
and objectives of PL 96-511.

General Comments: The group discussed the program manager's responsibi-
lities relating to information resources management (IRM), how these
responsibilities can be communicated and stressed to program managers,
and how program managers can be expeditiously engaged in the IRM process.

The first problem was defining exactly who the "Program Managers" are.
"Agencies," according to PL 96-511, cover the gamut from giant umbrella
departments like USDA to tiny independent operating agencies. The Admini-
strators of smaller independent agencies can accurately be called their
chief program managers, with Deputy Administrators and Division Directors
serving as secondary program managers. However, Secretaries of large, com-
plex departments and their Deputies and Assistant Secretaries generally
have scopes of activity which go far beyond our group's understanding of
"Program Manager's responsibilities."

The unanimous opinion of the group was that Program Managers in the large,
complex Departments can not effectively be brought into the IRM process
until the IRM structure is given strength and visibility at the program
level. In order to do this, all agencies having subcomponents with direct
control over the budget and allocation of appropriated program funds,
principal operating components (POC's), should be required by OMB to assign
an "IRM Manager" to oversee the implementation and operation of IRM policy
and procedural requirements generated by OMB or the agency Senior Official.

In order to ensure that the "IRM Managers" are in place in a timely manner,
and to maintain the momentum of the implementation of PL 96-511, OMB should
require that "IRM Managers" be designated by October 1, 1981.

Once a working structure is established for dealing with program officials
in all agencies, program managers should be required to actively interface
with IRM officials through the budgetary process. This would require three
things:

     1. The authorization of Senior Officials and, where appropriate,
subordinate "IRM Managers" reporting to a Senior Official, to oversee IRM
related components of each agency's or POC's budget.

     2. The requirement that uniform "real" IRM related line items such
as office equipment, telecommunications, ADP hardware and software, ADP
operations and development, mail, word processing, micrographics, etc.,
be established in all program budgets.

3. The requirement that uniform implied costs, such as inter- and intra-agency reporting and recordkeeping costs be included in or related to the Information Collection Budget.

Advantages of this internal structure are that:

1. Program activities generate most information requirements at the POC level. Only program level "IRM Managers" would be able to closely monitor, evaluate, and control these requirements.

2. Unification of IRM oversight at the program level would strengthen IRM activities and facilitate the awareness and acceptance of IRM by program officials.

3. The "IRM Managers" would serve as chief IRM advisors to program managers, as well as representatives of the Senior Official (where applicable) at the program level.

4. Without some uniform structure in large agencies composed of more than one POC, it will be difficult for Senior Officials to carry out the requirements of this Act.

5. Since most IRM-related personnel in the multi-POC agencies are employed at the POC level, establishment of "IRM Managers" at this level would dramatically increase the staff available to the Senior Official.

Recommendations:

1. That the Senior Official be responsible for overseeing the development of IRM related aspects of agency program budgets, except as noted in recommendation 2.

2. That OMB require principal operating components (POC's) located within agencies to designate "IRM Managers" by October 1, 1981. "IRM Managers" would be responsible for executing the policies and procedures promulgated by the Senior Official, including oversight of IRM related budgetary matters for their respective components.

Topic: The primary topic of concern to this group was actions Federal agencies could take, either collectively or independently, to increase productivity in the Federal sector. The topic was most directly related to the provisions of paragraph 3505(3)b, PL 96-511. The group focused on identifying ways in which the implementation of the Act could foster cooperative initiatives, especially in the use of information technology and office automation to improve Federal sector productivity.

General Comments: The group reported mixed views on the definition of the roles of OMB vs the other agencies in initiating and supporting government-wide initiatives to increase productivity. The recommendations are based on a realistic recognition that OMB itself could not directly plan and manage many initiatives and that there is a vital need for individual agencies to assume responsibilities and risks in initiating productivity improvement projects. It was agreed, however, that the agencies should look to OMB and lead agencies for policy, standards, and support, as well as coordination of activities throughout the Executive Branch.

With the assumption by lead agencies of a more effective coordinating role, operating agencies could take advantage of a body of knowledge already available from current projects and practices, but not widely known due to a lack of awareness and concern on the part of managers in the official channels for communicating such information. The group attempted to identify methods of increasing the effectiveness of these established vehicles of information exchange by modifying current agency management priorities.

Another major concern of the group was methods of dealing with those situations where the complexity or cost of evaluating a potential solution to the problem (for example, the use of video teleconferencing) was beyond the capabilities of any single agency. The group identified several ways that OMB or other lead agencies could help in these situations, via creative implementation of the Act.

Recommendations: The recommendations are directed to the lead agencies; that is, OMB, and to some extent GSA, OPM, GAO and other agencies with government-wide policy or standards responsibilities in the areas of information management, technologies, and productivity improvement.

1. OMB should provide basic information resources management policy guidance which can serve as a basis for:

    (a) Review and revision of current agency directives to conform with PL 96-511;

    (b) A practical operational concept for information resources management;

    (c) Organization planning and development of an information resources management structure at the agency level; and

    (d) Establishment of audit and review criteria.

2. OMB (or other lead agencies) should establish and promote better mechanisms for information sharing and exchange on information resources management and information technology by:

    (a) Establishing IRM project data banks for:

        o Input from agencies (either via voluntary or mandatory reporting),

        o Retrieval/access by agencies (by application or subject area),

        o Periodic published reports on significant projects with widespread applicability, emphasizing lessons learned, both good and bad.

    (b) OMB and others should sponsor and support recurring person-to-person exchanges via seminars, conferences, and demonstration projects. (The group expressed particular concern that these events involve personnel at both the operating level and the policy level in the agencies.)

3. OMB (or another lead agency) should actively support agency initiatives to develop new technology by:

    (a) Reviewing proposed developmental projects and sponsoring experiments by providing visibility and oversight to developmental efforts, and coordinating projects with related goals or applicability;

    (b) Providing specifically dedicated "seed money" to fund promising experiments and pilot tests;

    (c) Ensuring project continuity by providing multi-year funding commitments to developmental efforts.

4. GSA, or an appropriate lead agency, should acquire technological capabilities, as they become available, that are too extensive or expensive for single agencies to acquire cost-effectively (e.g., satellite communications; centralized on-line libraries or information bases). Many such innovations cannot be supported by a single program operation but may become cost-effective through multiple agency use, perhaps under the "single-manager" concept.

5. OMB and GSA should liberalize policies and regulations on amortizing system costs to enable agencies to have viable long-term equipment modernization plans, and should develop more effective methods for re-utilizing government-owned equipment, perhaps through an internal Federal program whereby an agency could "sell" surplus equipment to another agency directly and receive actual funds in return. This would enable agencies to avoid a parochial view concerning economic analysis (i.e., purchase vs lease decisions) by providing a new, broader concept of "amortized costs" in procurement decisions.

NARS PROGRAMS
Group B-2

Topic: This group discussed the impact of the Paperwork Reduction Act on the role of the National Archives and Records Service and its government-wide program in records and information management. The group developed suggested actions NARS could take that would help OMB and the agencies effectively implement the Act.

General Comments: The group acknowledged that those NARS programs impacted by the Act were operated by several organizational entities within NARS and, as in the case of the training programs, also involved other elements of GSA. The group decided to concentrate on those programs that had a specific obvious relationship to the Act, and areas in which NARS has a government-wide responsibility or lead agency role, under its current mandate.

Recognizing current resource limitations, which must be expected to continue, the group restricted its discussion to activities in which NARS could make a contribution in a coordinating role, and not necessarily assume new operating responsibilities.

The consensus of the group was that the recent shift in emphasis from records management to information management, and the accompanying activity in the technologies, is not sufficient to meet the requirements of PL 96-511. Additional attention must be given to both the process and the substance of information; the group felt that traditional NARS programs designed on the concept of records management as paperwork management conflict with the new requirements for programs based on information resources management concepts.

In a second area addressed by the group, reviews and inspections, NARS was viewed as playing a coordinating role supplementing OMB efforts by ensuring that agencies are not faced with conflicting or duplicate review require-ments. Recognizing that reviews are receiving a low priority among OMB responsibilities, NARS was viewed as being in a position to provide the basis of a balanced program by coordinating agency self inspection programs with the NARS inspection program and other review efforts.

In other areas where responsibility is fragmented or shared, NARS was also seen as having the coordinating role; for example, in reports management, or information management training efforts. A number of these areas were identified as components of NARS role in information management. The list of recommendations is not intended to be exhaustive but to suggest the nature of NARS interagency role.

Recommendations:

1. NARS should change its focus from "Records and Information Management" to "Information Resources Management". Accordingly, NARS should:

    a. re-evaluate and issue revised guidelines on life cycle management of information, with emphasis on automated information technology, and

    b. assume a leading role in research in automated information management.

2. NARS should establish a single inspection program which emphasizes effectiveness and compliance, and includes: scope, program review criteria, methodology, reporting requirements, and training.

   a. The program should be balanced and include agency self-inspections, NARS inspections, and coordination with triennial reviews, whether triennial reviews are directed by OMB or delegated to GSA/NARS.

   b. All inspections should be coordinated with the designated Senior Official.

3. NARS should assume a leading interagency role in information management, to include the following actions:

   o Take the lead role in coordination of Federal Government information requirements;

   o Provide for a locator system inventory of interagency information requirements and provide for validation of entries;

   o Promote establishment of and compliance with Federal Information Processing Standards (FIPS);

   o Augment existing policies to consider interagency implications in disposition of information;

   o Establish a government-wide IRM training program; and

   o Develop a uniform government-wide costing methodology for use in IRM.

Topic: This group concentrated on identifying actions which can be taken
by the lead agencies to ensure that implementation of the Paperwork Reduc-
tion Act is begun effectively, and that the momentum is maintained.

General Comments: The group agreed that OMB is, in fact, the only true
lead agency; that is, OMB is responsible for the formal development of
policies, standards, and guidelines for implementation of the Act. As
such, OMB must serve as the focal point for coordination of agency activities.

The group also agreed that OMB should continue to involve other agency repre-
sentatives in the process of implementation, and could save time and
resources by building on the body of issuances and technical guidance on
information management already available in the agencies. This material,
once assembled, would also provide a valuable resource to the designated
Senior Official in each agency.

Four areas that OMB should address in initial guidance were identified as
necessary for program agencies to use in formulating their strategies for
implementation:

   1. Definitions of the roles and responsibilities of OMB and of other
agencies, including those with agency program responsibilities for
information resources management, should be provided as part of policy
guidance from OMB. Such definitions and guidance are necessary to elimi-
nate confusion and to form a foundation for implementing activity in the
agencies.

   2. Definitions of key terms used in the legislation, such as "informa-
tion resources management", "reports clearance", "recordkeeping" and
"information collection" are an essential part of the initial guidance.

   3. Cost-estimating techniques are necessary to provide a common basis
for cost/benefit analyses of information resources management programs.
Cost estimating procedures for determining the cost of regulations and
of reporting requirements should be issued for common use.

   4. The Act provides for delegation of approval authority to the Senior
Official in the agencies. OMB should specify the criteria that will be
used to determine how and when agencies can earn this autonomy in
approving requests.

While the group did not consider GSA to be a lead agency by the strict defi-
nition of that term, the need for a proper balance of GSA functional respon-
sibilities in records management, ADP, and archives was recognized.

Recommendations: Three recommendations are addressed to OMB, and one to
GSA. The recommendations to OMB deal with the development and coverage
of initial policy guidance:

1. OMB should establish an advisory group consisting of program agency representatives to obtain input on development of guidance. This group, meeting regularly, would provide a forum for agencies to communicate concerns and recommendations to OMB, report progress, obtain feedback, and share information and ideas with each other.

2. OMB should compile a data base of current guidance on various aspects of information resources management from all agencies. This would include such issuances as OMB circulars, Federal Property Management Regulations, Federal Information Processing Standards. OMB should then undertake to review this material, reconcile conflicts, identify deficiencies, and initiate revisions or development of new guidance where necessary. Publication of an executive summary and index of this material by subject matter and agency would provide a basic resource for the agencies' designated Senior Officials.

3. OMB should issue initial guidance containing:

    a. Definitions of OMB's and other agencies' roles and responsibilities;

    b. Definitions of basic terms used in the legislation to ensure common understanding and consistency in implementing activities;

    c. Cost-estimating techniques and procedures; and

    d. Criteria for earned autonomy.

4. In accordance with the information resources management concept, GSA should review its functional responsibilities and assure proper balance between records management, ADP and telecommunications, and archives.

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